



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 10, 2001

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ORD 7398
7C

QAC 12/10/01

10/10/2001

FILE COPY

MEMORANDUM

SUBJECT: Van Waters & Rogers Division of Univar
EPA Site ID No. ORD009227398

FROM: Monica Tonel, Superfund Program
Office of Environmental Cleanup (ECL)

Monica Tonel

Judy Stone, Resource Conservation and Recovery Act Program
Office of Waste & Chemicals Management (WCM)

Judy Stone

TO: Official CERCLA and RCRA site files

BACKGROUND

On March 31, 1999, the Office of Inspector General (OIG) released an audit report entitled "Superfund Sites Deferred to RCRA," which assessed EPA's implementation of its Resource Conservation and Recovery Act (RCRA) deferral policy. The OIG concluded that a large portion of the sites deferred to RCRA did not meet the deferral criteria and were therefore inappropriately deferred. The above subject site has been identified as one of those "deferred" sites requiring a review of the deferral decision.

PURPOSE

This memorandum is written in reference to the interim guidance provided by EPA Headquarters, OSWER Directive 9200.1-31P, and serves to:

- clarify the current status of the above subject site in both the Superfund and RCRA programs,
- identify the program that will maintain responsibility for the site, and
- clarify any changes to the CERCLIS database resulting from this review.

Superfund program, current status. The Superfund Program has determined that its decision, made in 1991, to defer the subject site to the RCRA program is still valid. No further Superfund assessment work is anticipated, at this time. Should new or additional information become available necessitating further Superfund consideration, this site will be reevaluated at that time.

RCRA program, current status. This site was ranked "High" for RCRA corrective action. This is an EPA-lead site; corrective action is ongoing under a consent decree. Currently the site meets the Human Exposure Controlled environmental indicator.

SF tracking/CERCLIS database. The Non-NPL Status field in CERCLIS will continue to reflect a "Deferred to RCRA" value and the RCRA Deferral Audit Special Initiative Indicator will reflect a "RCRA Deferral-Lead Confirmed" value.

Additionally, in accordance with EPA's decision regarding the tracking of sites for which no further work under the federal Superfund program is planned at this time, the subject site was removed from the CERCLIS database and placed in a separate archival data base as a historical record. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.

Van Waters & Rogers Inc.
subsidiary of **Univar**

1363 SOUTH BONNIE BEACH PLACE
LOS ANGELES, CA 90023-4001
PHONE (213) 265-8123
FAX (213) 265-8542

OK 7398
9-18-91
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September 18, 1991

****Via Express Mail****

FILE
COPY

Amy Houghton
Ecology & Environment Inc.
101 Yesler Way
Seattle, Washington 98104

Subject: RFA/VS
Van Waters & Rogers Inc.
Portland, OR Facility
EPA ID ORD 009227398

Dear Ms. Houghton:

During your August 14, 1991 inspection of Van Waters & Rogers' (VW&R) Portland, OR facility, you requested additional information pertaining to the storm drain system shutoff and waste generated from spent solvent recycling activities. The information that you requested is being provided by means of this letter.

Storm Drain System Shutoff

Shutoff valves for the VW&R Portland facility storm drain collection and conveyance system were installed in two phases beginning in November 1981 and completed in September 1982.

Generation of Stillbottoms from Recycle Unit

1983 is the earliest year for which we have manifests for self-generated wastes to enable calculating quantities. 1983 probably was out last year of recycling spent solvents received solely in drums from a variety of off-site sources, as opposed to later years when "higher purity" feedstock was largely received in bulk from a single source.

Manifests from that period list the number of drums shipped with quantity being given in units of cubic feet. Without knowing the bulk density of the stillbottoms, conversion to gallon or pound units is not possible. Therefore, quantity units are in cubic feet.

1987 was the last year stillbottoms were shipped from the facility due to planned closure of the Recycle Unit in 1986, and probably is the year with lowest volume generated.

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These two years, therefore, provide a reasonable range of the quantity of stillbottoms generated during the last five years of operation of the Recycle Unit, with 1983 being the highest and 1987 the lowest. Due to the nature of feedstocks, the result of averaging the two years probably would be meaningless.

Stillbottoms Generated from Recycle Unit

<u>Year</u>	<u>Drums</u>	<u>Cubic Feet</u>
1983	165	1,213
1987	43	316

We trust this information is responsive to your needs. Should you have further questions or require additional information, please contact me at (213) 265-8123.

Sincerely,

VAN WATERS & ROGERS INC.



Nick K. Gardner
Regional Regulatory Manager
Western Region

jd

c: Kevin Schanilec - USEPA, Region 10, Seattle
Kirk Steinseifer - VW&R, Portland
George Sylvester - VW&R, Denver



ecology and environment, inc.

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

MEMORANDUM

DATE: March 28, 1988

TO: John Osborn, FIT-RPO, USEPA, Region X

THRU: ^{for} Jeffrey Villnow, FIT-OM, E&E, Seattle *JV*

FROM: ^{for} Lazar Gorelik, FIT-SM, E&E, Seattle *LG*

SUBJ: Preliminary Assessment Reassessment/
Preliminary HRS Score for
Van Waters & Rogers, Division of Univar
Portland, Oregon

REF: TDD F10-8801-39

CC: Deborah Flood, HWD-SM, USEPA, Region X
David Bennett, HWD, USEPA, Region X
George Brooks, FIT-PM, E&E, Seattle
Thomas Tobin, E&E, Seattle

A file review for Van Waters & Rogers Site, Portland, Oregon has been conducted to assess the completeness of the previously conducted Preliminary Assessment (PA) and to develop a preliminary HRS score. Using the file information, a preliminary HRS score of 8.55 was calculated based on the following information:

- o the primary drinking water source for the area is more than 10 miles from the site; and
- o the distance to the nearest surface water is approximately eight feet.

Assumptions used to derive the score include:

- o subsurface contamination with chlorinated solvents;
- o volume of waste is one drum and distance to nearest ground water well is one mile;
- o population served by ground water is 100 people;
- o depth to aquifer of concern is 21-75 feet; and
- o surface water intakes are more than three miles from the site.

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PA Reassessment/Preliminary HRS Score for
Van Waters & Rogers, Division of Univair
Page 2

Van Waters and Rogers (VWR) has operated at the present location since 1946. VWR recycles chlorinated solvents and stores hazardous wastes. A large number of hazardous materials in solid, liquid, and gaseous states are handled at the 12-acre site. Files indicate RCRA violations related to labeling, manifest differences, and improper storage of hazardous wastes. Little information is available in files on processes used and waste streams generated. Available information suggests that subsurface contamination has occurred at the site. The low HRS calculated for the site is due to the lack of information needed for an accurate assessment.

It is recommended that the site be investigated under the RCRA program to assure that VWR complies with RCRA requirements and to gather additional information to correct the preliminary HRS score.

LG:rls

TYPING/DISTRIBUTION REQUEST FORM

Ecology & Environment, Inc., Seattle, WA

Author: <u>Lazar Gareluk</u>		Circle: PM or SM	Project/TDD No.: <u>FID-8801-39</u>	
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